

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Administration of the North)
American Numbering Plan)

CC Docket No. 92-237
Phases One and Two

To: The Commission

**REPLY COMMENTS
OF
AERONAUTICAL RADIO, INC.**

Aeronautical Radio, Inc. ("ARINC"), hereby submits its reply to the comments of the American Petroleum Institute ("API") filed June 7, 1994, in the above-captioned docket.¹ API has raised a critical issue involving international proposals for a universal "Freephone Service" that should be addressed by the Commission in this proceeding. Specifically, the FCC should ensure that international numbering plan developments do not undermine users' interests in maintaining the utility of their existing toll free numbers and controlling infrastructure costs.

ARINC is the communications company of the air transport industry. In addition to providing numerous communications services to the airlines, ARINC frequently represents airline interests before governmental bodies such as the FCC. In that role, ARINC has long supported the Commission's efforts

¹ See Administration of the North American Numbering Plan, Notice of Proposed Rulemaking, 59 Fed. Reg. 24103 (May 10, 1994).

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to preserve the utility of the airlines' existing 800 numbers through establishment of the 800 Database and the requirement for number portability.² Unfortunately, certain developments in the international marketplace now threaten to frustrate both those efforts and the agency's ability to protect user interests in this docket as well.

As API suggests, Great Britain and France are advocating a European Telecommunications Standards Institute ("ETSI") proposal to implement called party paid (i.e., "free") inbound international calling via an 800 prefix followed by an eight digit number.³ This proposal raises very serious concerns for existing 800 Service users. First, users would not be guaranteed that they could keep their current 800 numbers, in which they have invested substantial marketing and other resources, even within an eight digit field. Such a loss would fly in the face of the FCC's recognition of the value of these numbers. Moreover, the movement to an eight

² See, e.g., Provision of Access for 800 Service, CC Docket No. 86-10; Reply Comments of Aeronautical Radio, Inc., filed May 3, 1988; Comments of Aeronautical Radio, Inc., filed July 17, 1989; Reply Comments of Aeronautical Radio, Inc., filed November 20, 1991; Reply Comments of Aeronautical Radio, Inc., filed Jan. 13, 1992; Comments of Aeronautical Radio, Inc., filed March 13, 1992; Comments of Aeronautical Radio, Inc., filed July 10, 1992; see also 800 Database Access Tariffs and the 800 Service Management System Tariff, CC Docket No. 91-129; Petition to Reject or, in the Alternative, Suspend and Investigate, filed by ARINC on March 18, 1993; Comments of Aeronautical Radio, Inc., filed April 15, 1994.

³ See API Comments at 6.

digit format following the 800 prefix for International Freephone Service would likely require expensive infrastructure changes for domestic use.

The U.S. proposal to the International Telecommunications Union on this issue advocates retention of a seven digit numbering format and grandfathering of existing 800 users' numbers in the new international system. However, ARINC has become increasingly concerned that carrier-led efforts to expedite the deployment of International Freephone Service may, together with European objections to the U.S. plan, cause user interests to be subordinated in that forum. Moreover, as API points out, such international developments may well affect the Commission's ability to effectuate the numbering plan policies it adopts herein. For all these reasons, ARINC urges the Commission (1) to make its views on protecting user interests in the preservation of their existing 800 numbers known to the appropriate international representatives, and (2) to ensure that international

numbering policies complement rather than undermine its
decisions in this docket.

Respectfully submitted,
AERONAUTICAL RADIO, INC.

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